

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PAUL JONES,

Plaintiff,

v.

MONTACHUSETTS REGIONAL
TRANSIT AUTHORITY et al

Defendants.

Civil Action No. 4:19-cv-11093-TSH

MAY 10 '21 PM 2:28 USB

PLAINTIFF'S RULE 26(a)(1) DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1), Plaintiff makes the following disclosures based on the information currently and reasonably available to Plaintiff:

A. Individuals Likely to Have Discoverable Information Supporting Plaintiff's Claims

Persons likely to have discoverable information may include, but may not be limited to, the following:

1. Paul Jones

572 Park Street

Stoughton, Ma 02072

2. Sharna Small-Borsellino, Joseph. I. Harrington and Mandy Mulcahy

3. Massachusetts Attorney General's Office

4. United States Attorney General's Office

5. All DEFENDANTS

6. MASSHEALTH, EXECUTIVE OFFICE OF HEALTH & HUMAN SERVICES

B. Documents A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

RESPONSE: Plaintiff references any and all documents produced or to be produced by Defendant.

Plaintiff is providing certain additional documents to Defendant. Plaintiff will produce any and all documents within Plaintiff's immediate possession, except any and all medical records Plaintiff has obtained which are voluminous and are available for inspection and copying by Defendant at a mutually agreeable date and time. Discovery continues .and subsequent relevant documents may be produced by Plaintiff, Defendant, or both.

Plaintiff requests copies of any and all relevant documents Defendant and its attorneys have in its possession or has obtained by subpoena/authorization/voluntary production.

Discovery continues .and subsequent relevant documents may be produced by Plaintiff, Defendant, or both.

1. Emails between Plaintiff, CCRD INC and all defendants Plaintiff custody.

2. Complaints to EEOC, MassHealth, Mass DOT, Executive Office of Health & Human Services and Defendants Plaintiff custody.

3. Plaintiffs Telephone records, Defendants Vendor Rate (Monthly / Quarterly) sheets Plaintiff custody.

4. All correspondence from Defendants, Commonwealth Community Recovery Division Inc.
CCRD Inc Insurance companies Plaintiff custody,
5. Third Party discovery request from subpoenas when I receive them MassHealth & Executive
Office of Health & Human Services, Massachusetts Attorney Generals Office, Massachusetts
United States Attorney General's Office
6. Third party emails when I receive them
8. Documents produced by defendants when I receive them

C. Damages

Plaintiff seeks \$900,000 in statutory damages for all violations under Title VII Retaliation,
Discrimination, Hostile Work Environment, Race & Sex Based, Disparate Impact.

Plaintiff seeks \$1,200,000 for damages for all Violations of M.G.L. c. 151B, §et seq.

Plaintiff seeks \$550,000 for damages for violations under INFLICTION OF EMOTIONAL
DISTRESS costs of this action and further relief as the court may deem proper.

D. As of May 5, 2021 Plaintiff will settle for \$420,000.

E. Insurance Agreements For inspection and copying as under Rule 34 any insurance agreement
under which any person carrying on an insurance business may be liable to satisfy part or all of a
judgment which may be entered in the action or to indemnify or reimburse for payments made to
satisfy the judgment. **RESPONSE:** None in Plaintiff's possession. Plaintiff is not being sued. See
Defendant's responses for insurance applicable for Defendant.

E. Plaintiff reserves the right to amend his 26(A)(1) Disclosures.

Dated: May 6, 2021

Respectfully Submitted,

Paul Jones

/s/ Paul Jones

572 Park Street

Stoughton, Ma02072

617-939-5417

Pj22765@gmail.com

May 6, 2021

Mark R. Reich (BBO# 553212)

Deborah I. Ecker (BBO# 554623)

KP Law, P.C. 101 Arch Street, 12th Floor

Boston, MA 02110-1109

decker@k-plaw.com, mreich@k-plaw.com

(617) 556-0007

CERTIFICATE PURSUANT TO LOCAL

RULE 7.1 & FED. R. CIV. P. 37(a)(5)(A)(i)

I, Paul Jones, hereby certify that on Wed, May 5th & 6th, 2021, I conferred in good faith to narrow the issue of both parties' filing a 26(a)(1) Disclosure into the court document.

Paul Jones
/s/ Paul Jones
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May 6, 2021

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CERTIFICATE OF SERVICE

I Paul Jones plaintiff Certify that I have emailed and mailed a copy to defendant's attorney of record, a true and correct copy of the foregoing has been furnished via USP mail to the above-mentioned individuals On this 6th day of May2021.

Respectfully Submitted

Paul Jones
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Stoughton, Ma02072
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May 6, 2021

/s/ Paul Jones

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